

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

VINCENT HENDERSON
Plaintiff,

V.

**HARRIS COUNTY, RON
HICKMAN, AND MICHAEL
RICHARD,**
Defendants.

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CIVIL ACTION NO. 4:18-CV-413

JURY DEMANDED

**DEFENDANTS HARRIS COUNTY AND MICHAEL RICHARD'S
SUPPLEMENTAL RULE 26 DISCLOSURES**

Defendants Harris County and Michael Richard collectively ("Defendants")
now serves their Supplemental Disclosures pursuant to FED. R. CIV. P. 26(a)(1)
and for its supplemental disclosures states as follows:

**(1) Fed. R. Civ. P. 26 (a)(1)(A)(i): Individuals Likely to Have Discoverable
Information that the Disclosing Party May Use to Support its Defenses:**

The following individuals are believed to have personal knowledge regarding
events related to the Plaintiffs' claims in this lawsuit:

Vincent Henderson, Plaintiff
c/o Damon Mathias
Mathias Raphael PLLC
13601 Preston Rd., Ste. W217
Dallas, Texas 75240
Telephone: (214) 713-1000
Email: damon@mrlaw.co

Harris County, Defendant
Michael Richard, Defendant

c/o Suzanne Bradley
Assistant County Attorney
1019 Congress, 15th Floor
Telephone (713) 274- 5330
Email: suzanne.bradley@cao.hctx.net

Defendants in this proceeding and they has knowledge as to the alleged incident on which this lawsuit is based.

Harris County Detention Sergeant A. Boone
Harris County Captain Curtiss Ruggles
Harris County Sergeant WalBurton
Harris County Detention Officer A. Vincent

Harris County Detention Officer T. Wooten
Harris County Detention Office R. Hoskins
Harris County Detention Officer L Bosch
Harris County Detention Officer L. Williams

Lt. James Wager
Office of Inspector General
Internal Affairs

Sgt. Kimberly Lee
Office of Inspector General
Internal Affairs

Deputy Tami Steptoe
Office of Inspector General
Internal Affairs
Captain Warner Ervin II
Office of Inspector General
Internal Affairs

Hubert Williston, M.D.
Medical Staff
Harris County Sheriff's Office
Health Service

Dianna Johnson
Doreen Jones A.R.N

Marya A. Bennett LVN
Leonard F. Cowden PA
Kerry Diaz CCA
Tia C Paley CCA
George H Steed OD
Michael O. Gubman LVN
Jacqueline A. Stake R.N.
Abelina Molina LVN
Alice D. Nowack CCA
Timothy C Allen MD
Anthony Okorodudu
Satya Ramadass MD
Fernando Cesani MD
Katherine D. Werner RN
TDCJ - Lyncher
2350 Atascocita Road
Humble, TX 77396

Gary Christman R.D.D.S.
Tammy K. Ramirez L.V.N.
Richard E Young NP
Pamela D. Henry L.V.N
Erik S. Johnson MD
Marion P. Shaver LVN
D. Tsamouris LPC-1
Barbara F Thomas LVN
Kendra S. Phelps MA LPC
Beverly S. Clark CCA
TDCJ – Kegans (HM)
707 Top St. Houston, TX 77002

Chris Wright MD
Woodlake MRI
1065 Gessner Rd, Ste. 100
Houston, TX

Mike Yuan MD PHD Alliance
Medical Specialists
1065 Gessner Rd, Ste. 202
Houston, TX 77055

Ana Uribe LVN

LaToya N. Bush LVN
George Griffin MD
Christina Casas LVN
Hubert N. Williston MD
Stephen Kaminsky
Harris County Sheriff's Office – Health Services
1200 Baker St.
Houston, TX 77002

Kimberly Burrage, OD Hattiesburg
Eye Clinic PA
1621 Hwy 15 North
Laurel, MS 39440

c/o Suzanne Bradley
Assistant County Attorney
1019 Congress, 15th Floor
Telephone (713) 274- 5330
Email: suzanne.bradley@cao.hctx.net

Defendants incorporate by reference as if fully set forth herein each of the individuals identified in each of the documents produced to or made available for Plaintiff's review, including, but not limited to, all the individuals identified in the Harris County Sheriff's Office Internal Affairs Division reports or other investigative reports, and all individuals identified in the Initial Disclosures, and any amendments and/or supplements thereto, all of Defendants' discovery responses, and any amendments and/or supplements thereto, documents produced or in any other fashion as part of any other civil litigation which has been produced to or made available for Plaintiff's review.
All individuals identified in Plaintiff's Initial Disclosure.

(2) Fed. R. Civ. P. 26 (a)(1)(A)(ii): Description of Documents by Category that the Disclosing Party May Use to Support Defenses:

1. Documents containing miscellaneous policies, procedures, and reports concerning Harris County and the Harris County Sheriff's Office.
2. Documents concerning training of Harris County Sheriff's Deputies and Detention Officers.

3. Documents and Investigative Reports relating to Plaintiff's actions, asserted claims and Plaintiff's allegations that are the subject of this litigation.
 4. Plaintiff's Medical Records.
 5. Video Recording of event.
 6. Plaintiff's Harris County Health Service Records.
 7. All records, documents, memorandums, interviews and statements referenced and identified in HC Bates stamped 00001 -29957, which have been produced.
 8. Records and documents referenced in Plaintiff's Initial Disclosures and response to Defendants' pretrial discovery request.
- (3) **Fed. R. Civ. P. 26 (a)(1)(A)(iii):**
Defendants may seek their attorneys' fees and costs of defense pursuant to 42 U.S.C. Section 1988. If sought, the attorneys' fees will be calculated by multiplying the number of hours spent by Defendants' attorneys by the appropriate hourly rate as established by its experts. Defendants have not yet made a calculation of the fees and costs it may seek. Defendants will supplement when they have done so.
- (4) **Fed. R. Civ. P. 26 (a)(1)(A)(iv):**
Not applicable.
- (5) **Fed. R. Civ. P. 26 (a)(1)(D)(2):**
Defendants have designated experts in accordance with the court's scheduling order.

Jay Coons, Ph.D.
Department of Criminal Justice and Criminology
College of Criminal Justice
Sam Houston State University
P.O. Box 2296
Huntsville, TX 77340
(See attached report and CV)

Carolyn R. Carman, O.D., F.A.A.O.
4901 Calhoun Road
Houston, TX 77204-2020

Respectfully submitted,

/S/ Suzanne Bradley

OF COUNSEL:

CHRISTIAN D. MENELEE
HARRIS COUNTY ATTORNEY
TEXAS BAR NO. 24088049

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suzanne.bradley@cao.hctx.net

ATTORNEY FOR DEFENDANTS

CERTIFICATE OF SERVICE

I hereby certify that on April 14, 2021, a true and correct copy of this Defendants' Supplemental Disclosures was served upon the following parties by ECF notice.

Damon Mathias
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Dallas, Texas 75240
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Email: damon@mrlaw.co

/s/ Suzanne Bradley

Suzanne Bradley
Assistant County Attorney